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September 29, 2021

## MEMORANDUM ENDORSED

## Via ECF

The Honorable Gregory H. Woods U.S. District Judge Southern District of New York 500 Pearl Street New York, NY 10007-1312

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 9/29/2021

Re: U.S. v. Chiaka Oguadinma

21 cr 314 (GHW)

Request to Modify Pre-Trial Travel Conditions

Dear Judge Woods:

I am the attorney of record for Chiaka Oguadinma on the above-captioned case. I am writing to respectfully request that Mr. Oguadinma's pre-trial conditions be modified to permit travel to the state of Louisiana for work purposes.

Since April 2021, Mr. Oguadinma has been employed as a roofer with Covey Remodeling in Woodlands, Texas. Starting on September 23, 2021, the Company has been sending employees to the state of Louisiana to perform work on houses damaged by Hurricane Ida. The company would like Mr. Oguadinma to work in Louisiana on a temporary basis for the next six months. I have provided contact information for Mr. Oguadinma's supervisor and a letter requesting permission to travel to Louisiana from his employer to the Government and Pre-Trial.

Mr. Chiaka and the other Covey Remodeling employees will be staying at 22970 Walker South Road, Denham Springs, Louisiana 70726. As Mr. Oguadinma's bail conditions permit travel to SDNY/EDNY and the state of Texas only, the defense now respectfully seeks to add travel to the state of Louisiana to Mr. Oguadinma's pre-trial conditions.

I have conferred with AUSA Slavik and Pre-Trial Officer McCoy-Brown, who supervises Mr. Oguadinma. Neither Pre-Trial nor the Government object to the modification of Mr. Oguadinma's pre-trial conditions to include travel to the state of Louisiana. The Government is requesting a one-week advance notice to Pre-Trial ahead of travel, which the Defense has no objection to.

Thank you for your time and consideration of this request.

Respectfully Submitted,

s/ Elena Fast Elena Fast, Esq. Counsel for Chiaka Oguadinma Application granted. The conditions of Mr. Oguandima's release are modified as follows: the defendant may travel to the District of Louisiana. All other conditions of the defendant's release remain in full force and effect.

The Clerk of Court is directed to terminate the motion pending at Dkt. No. 29.

SO ORDERED.

Dated: September 29, 2021 New York, New York

United States District Judge